

Remarks/Arguments

Applicant thanks Examiner Clark for her careful examination of this application and clear explanation of the claim rejections and for allowing claims 25-27 and conditionally allowing claims 3, 6-15, 18, and 21-24. Regarding claims 1, 2, 4, 5, 16, 17, 19, and 20, applicant respectfully submits that because the Zollo patent does not disclose all the claim limitations, it does not anticipate the claims and the claims stand patentable over the Zollo patent. Detail explanation follows:

Claim 1

Claim 1 describes an apparatus that comprises a photoreceiver that is operable to translate light signals into digital signals and transmit the digital signals. In the art of integrated circuits, it is well known that signal means a visual, audible or other indication used to convey information.¹ There is abundantly clear in the description of this application that the light signal being received by the photoreceiver and the digital signal translated and transmitted by the photoreceiver carry information.²

The Zollo patent discloses a method and assembly for mounting an electronic device having an optically erasable surface. The device in the Zollo patent that requires erasing is an erasable programmable read only memory (EPROM). The only requirement for the erasure is that the EPROM be irradiated with light of a certain wavelength. This erasure is performed by means of a window capable of transmitting ultraviolet light.³ The ultraviolet light is not a light signal because it does not carry information. After erasure, the ultraviolet light is not translated into any signal because the memory in the EPROM is erased. And the EPROM does not transmit a signal because an erase EPROM has no information to transmit.

¹ See, for example, The IEEE Standard Dictionary of Electrical & Electronics Terms 1218 (5th ed. 1992).

² See, for example, p. 11, ¶ 1 of this application.

³ See US 5,495,450, col. 1, ll. 41-44.

Because the Zollo patent does not disclose a photoreceiver that is operable to translate light signals into digital signals and transmit the digital signals, it does not anticipate claim 1 and claim 1 stands patentable over the Zollo patent.

Claims 2, 4, 5

Claims 2, 4, 5 properly depend from claim 1 and stand patentable at least by virtue of their dependency.

Claim 16

Claim 16 describes a method that comprises flip-chip mounting a photoreceiver on a substrate and the photoreceiver is operable to translate light signals into digital signals and transmit the digital signals.

As explained in argument relating to claim 1, in the art of integrated circuits, it is well known that signal means a visual, audible or other indication used to convey information and it is clear in the description of this application that the light signal being received by the photoreceiver and the digital signal translated and transmitted by the photoreceiver information carry information.

The device that receives ultraviolet light during an erasure operation in the Zollo patent is an erasable programmable read only memory (EPROM). The only requirement for the erasure is that the EPROM be irradiated with light of a certain wavelength. The ultraviolet light is not a light signal because it does not carry information. After erasure, the ultraviolet light is not translated into any signal because the memory in the EPROM is erased. And the EPROM does not transmit a signal because an erase EPROM has no information to transmit.

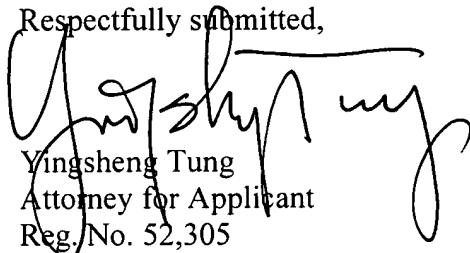
Because the Zollo patent does not disclose mounting a photoreceiver that is operable to translate light signals into digital signals and transmit the digital signals, it does not anticipate claim 16 and claim 16 stands patentable over the Zollo patent.

Claims 17, 19, and 20

Claims 17, 19, and 20 properly depend from claim 16 and stand patentable at least by virtue of their dependency.

In summary, applicant respectfully submits that this application is in allowable form and claim 1, 2, 3, 4, 16, 17, 19, and 20 distinguish over the Zollo patent and stand patentable. Applicant respectfully request further examination of this application and timely allowance of all pending claims.

Respectfully submitted,


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